

Beata Shapiro, Esq.
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Attorneys for Defendants 2810026 CANADA LIMITED, 2810034 CANADA LIMITED and
FREDERICK GROUP INC./Third Party Plaintiffs

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

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JEFFREY ROTH, :

Plaintiff, :

-against- :

2810026 CANADA LIMITED LTD., 2810034 CANADA :
LIMITED, FREDERICK GROUP INC. and SINGH :
AMARJIT, :

Defendants. :

2810026 CANADA LIMITED, 2810034 CANADA :
LIMITED and FREDERICK GROUP INC., :

Defendants/Third Party Plaintiffs :

-against- :

PAMELA J. BAUMAN :

Third Party Defendant :

----- X

**Case No.: 1:13-cv-00901-
RJA-LGF**

DISCLOSURE OF EXPERT WITNESS

The Defendants, 2810026 CANADA LIMITED, 2810034 CANADA LIMITED and
FREDERICK GROUP INC., by and through their attorneys, WILSON ELSE MOSKOWITZ
EDELMAN & DICKER LLP, respectfully submit their expert witness that they anticipate
calling at trial in this matter:

I. EXPERT WITNESSES

1. John J. Leddy, M.D.
University Sports Medicine
SUNY Buffalo
160 Farber Hall
Buffalo, NY 14214

Dr. Leddy's expected testimony will involve his medical evaluation of Plaintiff Jeffery Roth's medical records and films and his impression of Plaintiff's medical status and condition as set forth in his report dated September 27, 2014, which may be supplemented as additional discovery is obtained.

Dr. Leddy's fee for services is \$450 per hour. Copies of Dr. Leddy's expert report, curriculum vitae and testimonial history are attached hereto as Exhibit A.

II. NON-RETAINED EXPERTS

1. Any rebuttal expert witness not yet identifiable.

Dated: Stamford, Connecticut
October 16, 2014

Respectfully Submitted,
THE DEFENDANTS/THIRD PARTY
PLAINTIFFS 2810026 CANADA LIMITED,
2810034 CANADA LIMITED and FREDERICK
GROUP INC.

By: /s/ Beata Shapiro
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CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2014, a copy of the foregoing was served using the Court's CM/ECF system, which sends notification of such filings to all counsel of record as follows:

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/s/ Beata Shapiro
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